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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELIZABETH POOLE, as Individual Assignee of
Rights of RENE ARGUELLES JR.,

Case No: 2:24-cv-01981-CDS-BNW

Plaintiff

**STIPULATION AND ORDER FOR
EXTENSTION OF TIME FOR FILING
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

PROGRESSIVE DIRECT INSURANCE COMPANY.

[ECF No. 26]

Defendant

Defendant PROGRESSIVE DIRECT INSURANCE COMPANY, and Plaintiff

ELIZABETH POOLE, through their respective counsel, stipulate and agree as follows:

On May 22, 2025, Defendant filed a Motion for Summary Judgment (“Motion”) [ECF #25]. Plaintiff’s Opposition to the Motion is currently due on June 12, 2025.

Defendant is still in the process of reviewing the complete claims file, preparatory to production of the same. Plaintiff has requested such documents and sufficient time to review the same prior to completing her opposition to Defendant's Motion. As such, the parties have agreed to a 30 day extension for Plaintiff to file her Opposition to the Motion. The new due date for the Opposition will be July 14, 2025.

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1 This Stipulation is submitted in good faith and is not interposed for purposes of delay. This
2 is the first request to extend the deadline for Plaintiff to file an Opposition to Defendant's Motion
3 for Summary Judgment.

4 DATED: June 10, 2025

5 **OHLSON CORNE LLO**

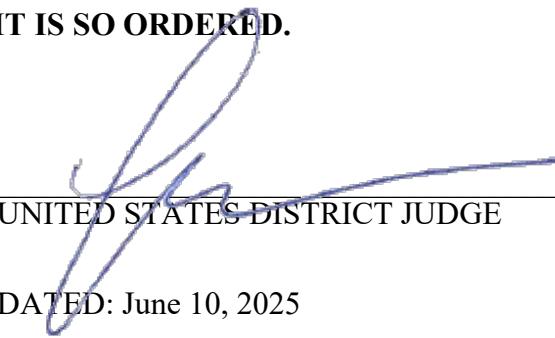
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7 By: /s/Justin A. Corne.
8 JUSTIN A. CORNE, ESQ.
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10 6060 Elton Avenue
11 Las Vegas, Nevada 89107
12 *Attorneys for Plaintiff*

5 DATED: June 9, 2025

6 **BARRON & PRUITT, LLP**

7 By: /s/ William H. Pruitt
8 WILLIAM H. PRUITT, ESQ.
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12 *Attorneys for Defendant*

13 **IT IS SO ORDERED.**

14 
15 UNITED STATES DISTRICT JUDGE

16 DATED: June 10, 2025

17 **BARRON & PRUITT, LLP**
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